

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

SCARLETT PAVLOVICH,

Plaintiff,

v.

Case No. 25-CV-00078

NEIL GAIMAN and
AMANDA PALMER,

Defendants.

DEFENDANT NEIL GAIMAN'S MOTION FOR LEAVE TO FILE UNDER SEAL

Defendant Neil Gaiman, by and through his counsel, and pursuant to the Western District of Wisconsin Administrative Order 337, Western District of Wisconsin Electronic Filing Procedure VI(B), Federal Rules of Civil Procedure 5.2, and other applicable law, respectfully moves for leave to file under seal the following materials: Exhibits A and C to the Declaration of Neil Gaiman in Support of Motion to Dismiss. The reasons and grounds for this motion are as follows:

1. Exhibit A is a series of electronic messages between Gaiman and the plaintiff, Scarlett Pavlovich on the WhatsApp messaging service.
2. To provide context to the conversations between Gaiman and Plaintiff, and to avoid accusations of cherry-picking messages, the complete conversations are included in Exhibit A.
3. These conversations include the name of Gaiman's minor son, the names of individuals not related to the claims in plaintiff's complaint, Gaiman's personal

email address, Gaiman's entertainment services account information (Gaiman's Sonos account, etc.) and the former address of the Plaintiff.

4. A redacted version of Exhibit A will be filed with Gaiman's declaration.

5. The redacted version of Exhibit A contains all the salient information that the public might be interested in while protecting the identities of individuals who have nothing to do with the underlying claims in the complaint and protecting Gaiman's personal accounts.

6. Exhibit C is the Independent Contractor Agreement between Gaiman and the plaintiff. Exhibit C contains the name of Gaiman's minor son.

7. Pursuant to Fed. R. Civ. P. 5.2 and Western District of Wisconsin Electronic Filing Procedure VI(A), Gaiman's son's name must be redacted.

8. A redacted version of Exhibit C will be filed with Gaiman's declaration.

WHEREFORE, for the foregoing reasons, and in the interests of justice, Defendant Neil Gaiman respectfully requests that the Court grant his leave to file Exhibit A and Exhibit C to the Declaration of Neil Gaiman in Support of Motion to Dismiss under seal, as restricted only to the parties.

Dated this 4th day of March, 2025.

Respectfully submitted,

s/ Stephen E. Kravit

Stephen E. Kravit

State Bar No. 1016306

Brian T. Fahl

State Bar No. 1043244

Wesley E. Haslam

State Bar No. 1121993

Andrea N. Panozzo

State Bar No. 1122016

Kravit, Hovel & Krawczyk s.c.

825 North Jefferson Street, Suite 500
Milwaukee, Wisconsin 53202
(414) 271-7100 (phone)
(414) 271-8135 (facsimile)
kravit@kravitlaw.com
btf@kravitlaw.com
weh@kravitlaw.com
anp@kravitlaw.com

-and-

BERK BRETTLER LLP

s/ Andrew B. Brettler
Andrew B. Brettler
Pro hac vice (admission applied for)
Jake A. Camara
Pro hac vice (admission applied for)
Berk Brettler LLP
9119 West Sunset Boulevard
West Hollywood, California 90069
(310) 278-2111
abrettler@berkbrettler.com
jcamara@berkbrettler.com

Attorneys for Defendant Neil Gaiman